

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION**

**IN RE: WARREN JAY BOOTHE
 DEBTOR**

**CHAPTER 13
CASE NO. 11-50586**

MOTION TO QUASH GARNISHMENT

Comes now your applicant, **WARREN JAY BOOTHE**, by Counsel, pursuant to Bankruptcy Code §362 (a), and respectfully represents:

1. That your applicant(s) have filed their petition for relief under Chapter 13 of Title 11 of the United States Code;
2. That your applicant is subject to a garnishment issued by: **AUGUSTA COUNTY GENERAL DISTRICT COURT, 6 E JOHNSON ST., STAUNTON, VA 24401**, within 90 days of the filing of the above named petition;
3. That said garnishment is in favor of: **AUGUSTA MEDICAL CENTER, C/O SCOTT/KRoner, PLC., 418 E. WATER ST., CHARLOTTESVILLE, VA 22902.**
4. The EMPLOYER is: **HARRIS TEETER, ATTN: PAYROLL, PO BOX 10100, MATTHEWS, NC 28106;**
5. The creditor is attempting to garnish: **EMPLOYEE'S WAGES.**

WHEREFORE, your applicant prays that said garnishment be quashed and that he have such other and further relief as the nature of his case may require.

Date: May 5, 2011 Respectfully submitted,

By: /s/ David Cox
Counsel for Debtor

COX LAW GROUP, PLLC
900 LAKESIDE DRIVE, SUITE A
LYNCHBURG, VA 24501
(434) 845-2600

Certificate of Service

I certify I have sent by postage prepaid, first class U.S. Mail this pleading to the Debtor; Debtor's Employer: **HARRIS TEETER, ATTN: PAYROLL, PO BOX 10100, MATTHEWS, NC 28106**; to the court: **AUGUSTA COUNTY GENERAL DISTRICT COURT, 6 E JOHNSON ST., STAUNTON, VA 24401**; and to the Creditor: **AUGUSTA MEDICAL CENTER C/O SCOTT/KRoner, PLC., 418 E. WATER ST, CHARLOTTESVILLE, VA 22902**.

/s/ David Cox
Counsel for Debtor